

REMARKS

Claims 1-24 remain pending in the application. The claims have been amended to further clarify the subject matter regarded as the invention.

This amendment is to expedite prosecution and should not be construed as acquiescence in any ground of rejection. Applicants reserve the right to prosecute the originally filed claims in the future.

Rejections Under 35 USC 103

The claims have been rejected under 35 USC 103(a) as being unpatentable over Maxwell et al. (US Patent No. 5,675,784) in view of Blinn et al. (US Patent No. 5,999,914). The rejection is respectfully traversed. Applicants submit that the claims of the instant invention are non-obvious and patentable over the claims of the cited art.

Applicant respectfully traverses the assertion that each reference is attacked individually. Applicant merely traverses the Examiner's assertions below with respect to the currently pending claims. Specifically, Applicant respectfully asserts that Maxwell fails to disclose or suggest the claim elements the Examiner asserts are disclosed by Maxwell. Blinn fails to cure the deficiencies of Maxwell. Accordingly, Applicant respectfully asserts that the Examiner has failed to make out a prima facie case of obviousness.

With respect to claims 1, 22, 23, and 24, as amended, Applicant respectfully traverses the Examiner's assertion that Maxwell teaches storing both a manufacturer SKU that identifies a product and a customer SKU that identifies the product. Specifically, Maxwell neither discloses nor suggests "storing the product data, the product data including both a manufacturer SKU that identifies the product and at least one customer SKU that identifies the product, each customer SKU being associated with a customer for which the product data is being stored for subsequent distribution to the customer, wherein the stored product data is suitable for use by the customer in an electronic catalog, the customer being a manufacturer, retailer, or

distributor of the products.” (Emphasis added). Rather, Maxwell describes a single identifier as typically used to identify a product.

In the most recent Examiner’s response, the Examiner asserts that “Referring to 14D, step 831, Maxwell does teach the step of storing both manufacturer and customer SKU.” The Examiner cites col. 8, lines 42-67 and FIG. 14 of Maxwell. However, Applicant respectfully asserts that Maxwell fails to disclose both a manufacturer SKU and a customer SKU for each of the products. In fact, only a single product_sid – “a unique identifier for a product” is disclosed in Maxwell. See col. 8, lines 42-67.

The Examiner asserts that the ““bundle-product” includes both a manufacture and customer SKU (i.e., “product-SID” and “creator-USER-SID” are stored in the same storage. Column 9, lines 43-50, Maxwell discloses the method of storing the product ID associated with the user.” Applicant respectfully traverses this assertion. In fact, the “creator-USER-SID” is an “ID of the user who first added the associated record to the system.” See col. 8, lines 64-65. In other words, the creator-USER-ID identifies a user, not a product. In addition, the purpose of identification of the user who added a record to the system is clearly for debugging and security purposes to ensure integrity of the underlying system. In no manner is the “creator-USER-SID” used to identify an SKU that identifies a product or, more specifically, a customer SKU that identifies the product, where the customer SKU is associated with a customer for which the product data is being stored for subsequent distribution to the customer, as recited in claims 1, 22, 23, and 24. Thus, Applicant respectfully asserts that the Examiner has failed to make out a prima facie case of obviousness. Moreover, since the product-SID is the only identifier used to identify a product, Maxwell teaches that a single identifier is sufficient to identify a product. Accordingly, Maxwell teaches away from storing two separate SKUs for a single product.

In addition, it is important to note that claim 1 recites that the customer SKU is associated with a customer for which the product data is being stored for subsequent distribution to the customer. In other words, claim 1 indicates that the product data is being stored for distribution as an end product (e.g., suitable for use in an electronic catalog), where the customer is a manufacturer, retailer, or distributor of the product. Neither of the cited references discloses or suggests distributing product data suitable for use in an electronic catalog, where a customer SKU is associated with a customer

for which the product data is being stored for subsequent distribution to that customer. In fact, the cited references disclose the storing of product data to enable a user to search through the product data to enable the user to submit an order for the product. Thus, the cited references are directed to a system targeted to a consumer, not to a manufacturer, retailer, or distributor of the product who intends to generate a catalog with the data. As such, the cited references teach away from the claimed invention. Moreover, the combination of the cited references would fail to achieve the desired result, which is to provide catalog data suitable for use in a catalog to a customer for products identified by a corresponding SKU. Thus, the combination of the cited references would fail to operate as claimed.

Moreover, it is also important to note that with a single SKU (e.g., manufacturer SKU) for each product, it would be impossible to map manufacturer SKUs to customer SKUs associated with a particular manufacturer, retailer, or distributor receiving the data. As a result, data could not be easily customized for use by different customers in a catalog using their customer SKUs. In fact, if a customer were to receive data including a single SKU for each product (e.g., manufacturer SKU), these SKUs would most likely be meaningless to the customer receiving the data, and the customer (e.g., manufacturer, retailer, or distributor) would be unable to easily correlate these third party's SKUs to its own SKUs. In addition, it would be impossible to identify the customer(s) who are to receive data for each of the products (and the customers' SKUs), since data for some products may be requested by multiple customers, each of whom may maintain their own SKUs. Accordingly, the combination of the cited references would fail to be operable for the intended purpose.

It is also important to note that since Maxwell fails to disclose two different SKUs that identify the same product, Maxwell also fails to disclose a manufacturer SKU that identifies the product and a customer SKU that identifies the product, the customer SKU being associated with a customer for which the product data is being stored for subsequent distribution to the customer, wherein the stored product data is suitable for use by the customer in an electronic catalog, the customer being a manufacturer, retailer, or distributor of the products. The Examiner admits that "Maxwell does not explicitly disclose the step of storing the product data including both a manufacturer SKU that identifies the product and a customer SKU that identifies the product, wherein the stored product data is suitable for use in an

electronic catalog, the customer being a manufacturer, retailer, or distributor of the product.” The Examiner seeks to cure the deficiencies of Maxwell with Blinn.

① Blinn fails to cure the deficiencies of the primary reference. The Examiner cites column 1, lines 6-9 of Blinn, stating that Blinn discloses the method of distributing data. Applicant respectfully traverses this assertion. In fact, in no manner does Blinn disclose or suggest distributing product data. Moreover, Blinn fails to disclose or suggest distributing product data suitable for use in an electronic catalog. More specifically, Blinn fails to disclose or suggest distributing product data for use by a customer, where the customer is a manufacturer, retailer, or distributor of the products. The Examiner cites col. 1, lines 6-9 of Blinn. However, col. 1, lines 6-9 of Blinn merely state that the “invention relates to electronic merchandising systems, which provide merchants the ability to sell products over distributed public networks such as the Internet.” In addition, Blinn relates to “electronic merchandising systems...for providing customizable and flexible merchandising promotions over the Internet.” Column 1, lines 6-11. In other words, Blinn discloses providing merchandising promotions to a consumer (e.g., shopper) using an electronic merchandising system, rather than providing information or services to a manufacturer, retailer or distributor of products. For instance, Blinn discloses that “in some cases one promotion may give the consumer a free music tape when the consumer buys three music tapes.” Blinn, col. 2, lines 49-51. Thus, while Blinn may enable product data to be viewed by a consumer/shopper ordering a particular product, Blinn neither discloses nor suggests distributing product data or, more specifically, distributing product data to a customer, where the customer is a manufacturer, retailer, or distributor of products. Therefore, Blinn fails to cure the deficiencies of Maxwell. In other words, the present invention enables product data as an end product to be distributed to a manufacturer, retailer, or distributor of each product for which data is requested, rather than merely accessed by a user to enable an order to be submitted, as supported by the cited references. As such, the cited references teach away from the claimed invention. In addition, Applicant respectfully asserts that the Examiner has failed to make out a prima facie case of obviousness.

As a result, combining the references would fail to achieve the desired result, which is to enable a manufacturer, retailer or distributor to generate a catalog from data that is stored and ultimately distributed to it. In fact, since neither of the cited references, separately or in combination, discloses both a manufacturer SKU

identifying a product and a customer SKU identifying the product, a manufacturer, retailer, or distributor would be unable to map manufacturers' product identifiers with their own, as supported by the pending claims. Thus, the combination of the cited references would be inoperable for the intended purpose. Accordingly, Applicants respectfully submit that Claims 1, 22, 23, and 24 are allowable. As Claims 2-21 are dependent upon Claim 1, Applicants submit that these claims are also allowable.

The dependent claims further recite additional limitations that are not further disclosed in Maxwell. For example, with respect to claims 2 and 3, the Examiner refers to col. 6, lines 15-18 and lines 45-48. However, the cited portions of Maxwell neither discloses nor suggests a data entry template that “includes a listing of potential values associated with each of the attributes in the category of the classified product, wherein the listing of potential values identify values that are selectable as values for the associated attribute.” For instance, an attribute may be speed or size. As recited in claim 2, each attribute has an associated list of potential values that may be selected as a value for the attribute. The cited portion of Maxwell merely discloses consistent description format and the data architecture, enabling a variety of search alternatives once data has been stored. See col. 6, lines 45-57. However, Maxwell fails to disclose a process or manner of providing such a list of values from which attribute values may be selected for data values that are to be entered (e.g., prior to storing the values). The Examiner further cites FIG. 13, steps 163 and 146, as well as col. 6, lines 27-58. While FIG. 13 step 163 specifies a “sub class lease pricing tier” and step 146 specifies a “spec value ranking group,” the meaning of these blocks is unclear. In addition, col. 6, lines 27-58 indicates that while a manufacturer is chosen from a selection list, the family, model, part number, universal product code (UPC), and manufacturer's suggested retail price (MSRP) are entered”. (Emphasis added.) For instance, as shown in FIG. 10, a field is made available for entry of a “Price.” A quantity is entered, but is not selected from a list of potential quantities. Rather, the user must manually enter this quantity. As such, Maxwell teaches away from providing a data entry template, “wherein the data entry template includes a listing of potential values associated with each of the attributes” as recited in claim 2.

Moreover, with respect to claim 3, neither of the references discloses repeating the listing of potential values for the classified product when the attribute group associated with the classified product is indicated to be a repeating group in the data model. Although col. 6, lines 15-18 of Maxwell disclose a loop that is used to

“create” components, Maxwell fails to disclose or suggest repeating a listing of potential values....when the attribute group associated with the classified product is indicated to be a repeating group in the data model. Accordingly, Applicant respectfully submits that claims 2 and 3 are allowable over the cited art.

Similarly, with respect to claims 4, 5 and 15, Applicant was unable to find a reference to a possible value list associated with each attribute that identifies values that are selectable as values for the associated attribute, where each of the attributes has at least one of the values in the associated possible value list. Rather col. 7, lines 60-67 of Maxwell appear to indicate that the data structure may store values, not that such values may be selected from a possible value list. Similarly, with respect to claim 5, Maxwell neither discloses nor suggests a possible unit list associated with each attribute, where the possible unit list includes units that are selectable. Rather, as indicated in FIG. 8 of Maxwell, it appears that the units (e.g., Hz, MHz) are not selected from a list of units, but are presented in the component description. As stated above, the user may merely enter a quantity associated with the static description. Accordingly, Maxwell teaches away from the invention of claims 4, 5, and 15.

Similarly, with respect to claim 16, the Examiner cites col. 5, lines 43-52 of Maxwell, which states that “[c]omponents have attributes, and attributes have specification values associated with them.” However, Maxwell neither discloses nor suggests classifying the product according to a data model having one or more classes, wherein each of the classes is arranged to identify one or more associated categories and each of the categories is arranged to identify an associated attribute group having one or more attributes, each attribute having an associated possible value list that identifies values that are selectable as values for the associated attribute. Moreover Maxwell fails to disclose or suggest selecting at least one of the values in the associated possible value list for selected attributes in the associated attribute group. Furthermore, Maxwell neither discloses nor suggests inputting the selected values for the product to the system product data file. In fact, Maxwell suggests that each attribute has a single value associated therewith rather than a list of selectable values. As such, Maxwell teaches away from the claimed invention. Accordingly, Maxwell teaches away from the invention of claim 16.

With respect to claims 6 and 9, the Examiner admits that Blinn fails to disclose “storing a system SKU associated with the product in the product header,” “storing a manufacturer SKU associated with the product in the product header,” or

“associating the product header with product information characterizing the product.” While col. 11, lines 1-15 of Blinn discloses a key-value pair to uniquely identify a particular item indicating a price and quantity of ordered items, Blinn fails to cure the deficiencies of the primary reference. In fact, Blinn relates to items that have been ordered, rather than merely storing catalog data independent of orders that may be processed from a catalog that is composed from stored catalog data such as that claimed. In other words, the presently claimed invention enables product data to be stored and ultimately transmitted for use in catalogs. Stated another way, the presently claimed invention is used to compose a catalog (e.g., by a manufacturer receiving requested product data). Blinn may only be used to identify products that have been ordered from a catalog. Thus, Applicant respectfully submits that Blinn fails to cure the deficiencies of the primary reference. Accordingly, Applicant respectfully submits that claims 6 and 9 are allowable over the cited art.

With respect to claims 8 and 17, the Examiner cites col. 13, lines 13-35 of Blinn, which indicates that each column in a product table may have a schema field, which may, for instance, be an image file name. However, Blinn fails to disclose linking a product header to one or more images illustrating the product, as recited in claim 8. Accordingly, Applicant respectfully submits that claims 8 and 17 are allowable over the cited art.

With respect to claims 10, 11, and 19, as set forth above, Maxwell neither discloses capturing and storing product data including both a manufacturer SKU and a customer SKU. Blinn fails to cure the deficiencies of the primary reference. With respect to Claims 10 and 19, Applicants submit that neither Blinn nor Maxwell disclose or suggest specifying one or more countries for which the product is adapted for sale. Similarly, with respect to Claim 11, the cited art neither discloses nor suggests providing one or more possible countries that are selectable as countries for which the product is adapted for sale. Although the Examiner cites col. 10, lines 65-67, this indicates that the messages value identifies the language used for error messages, rather than identifying a country for which a product is adapted for sale. In other words, Blinn neither discloses nor suggests the purpose for which a country might be specified as claimed or the problem that is being solved (e.g., identifying a country in which a product is adapted for sale or can be used, such as in the instance of varying voltage requirements). Blinn merely discloses the ability to provide error messages in different languages. Accordingly, the combination of Blinn and Maxwell

would fail to achieve the desired result, which is to enable product data to be stored that indicates which countries a product is adapted for sale. For instance, electronics may be designed in different ways in order to be used in different countries (and are therefore compatible with various electrical specifications). Applicant therefore respectfully submits that claims 10, 11, and 19 are allowable over the cited art.

In addition, with respect to claims 12-14 and 20-21, although col. 5, lines 30-42 and 53-55 of Maxwell disclose defining a group for “similar kinds of components” and groups similar types of products, such as “hardware” and “computer systems,” Maxwell neither discloses nor suggests linking to or identifying one or more related products that are recommended as compatible with the product as recited in claims 12 and 20. Similarly, Maxwell neither discloses nor suggests linking to platform compatibility information associated with the product indicating one or more platforms that are compatible with the product, as recited in claim 13. Moreover, with respect to claim 21, the Examiner cites col. 5, lines 10-12 of Maxwell, which illustrates “but one example of hardware on which the subject invention may be implemented.” However, Maxwell neither discloses nor suggests “inputting to the system product data file platform compatibility information associated with the product indicating one or more platforms that are compatible with the product.” In other words, the presently claimed invention enables various platforms to be identified that are compatible with each product for which data is stored. The combination of Maxwell and Blinn would fail to provide this desired functionality. Accordingly, Applicant respectfully submits that claims 12-14 and 20-21 are non-obvious and patentable over Maxwell in view of Blinn. Applicants therefore respectfully request withdrawal of the rejection under 35 USC 103.

Conclusion

The Applicants respectfully maintain that all pending claims are in condition for allowance. Therefore, Applicants respectfully request a Notice of Allowance for this Application from the Examiner. Should any unresolved issues remain, the Examiner is encouraged to contact the undersigned at the telephone number provided below.

Respectfully submitted,

BEYER, WEAVER & THOMAS, LLP

A handwritten signature in black ink, appearing to read 'Elise R. Heilbrunn', is written over the printed name.

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